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THOMAS S. GULOTTA



DONALD F. KANE

COMMISSIONER OF POLICE

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JUL 30 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
WASHINGTON, DC 20554

In the Matter of

Replacement of Part 90 by
Part 88 to Revise the Private
Land Mobile Radio Services and
the Policies Governing Them

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PR Docket No. 92-235

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MAIL BRANCH

**REPLY COMMENTS OF
POLICE DEPARTMENT
COUNTY OF NASSAU
NEW YORK**

The Nassau County Police Department submits the following reply comments in response to the above captioned Notice of Proposed Rule Making.

Respectfully Submitted by:

William McHale
Captain
Commanding Officer
Communications Bureau

Date: July 29, 1993

The Nassau County Police Department of Long Island, New York is a 3,819 member agency responsible for all aspects of law enforcement and the protection of life and property within a geographic area of 287 square miles. In addition to traditional Police duties, this department is responsible for the administration and operation of the countywide Emergency Medical Service. The population served by this Department is in excess of 1.3 million people. During 1997 this Department received 657,741 emergency 911 calls. 30,280 of these calls required

This system also includes a state-of-the-art, radio-based, C.A.P.E.R. alarm system which provides instant dispatcher notification of citizens who are about to become victims of robbery, burglary, and domestic violence. It, alone utilizes over 200 portable 470 MHZ handie-talkies. It is evident that effective radio system coverage be maintained if such a system is to provide the required high-degree of reliability.

The entire Police and EMS radio system is comprised of 16 satellite receiver sites, 5 transmitter sites, numerous control stations, and a combination of over 1500 mobile and portable units. The system is interconnected via an extensive 2 GHZ microwave backbone system which shares all of the terrain and frequency issues previously described.

Approximately two years ago, this Department undertook a major Communications System upgrade project costing approximately 12.5 million dollars. The project was undertaken during a critical financial period for Nassau County. Funding for the project was obtained after months of hard work and financial analysis. However, the resulting financial burden was easily justified when considering the ultimate goal to protect the life and property of the citizens of this County.

This will result in the need to utilize more microwave spectrum to provide our system backbone. Given the controversy surrounding the 2 GHZ band, the potential requirements may be impossible to meet with any degree of cost effectiveness. Further, such new radio sites will require elaborate interference protection equipment. (This resulting from the nature of the new technology coupled with topography, site crowding and co-location of non-public safety users.) Finally, there is potential for precluding the use of high-speed data (wide-bandwidth) and imaging equipment due to the loss of contiguous channels by any one Public Safety user.

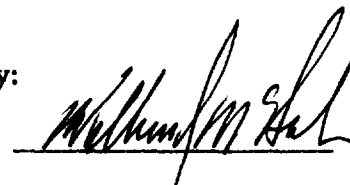
The needs and concerns of the Public Safety Community have been thoroughly addressed by APCO in their comments to the Commission. They offer a workable solution to many of the problems addressed above and have repeatedly demonstrated their expertise in technical, frequency coordination, and licensing matters which face the Public Safety Community on a daily basis. In doing so, they have remained sensitive to the needs of the vast majority of other land mobile radio users. They are further supported by the comments and Consensus Plan, Version A, which was developed and submitted by the Land Mobile Communications Council.

This Department supports the position taken by APCO and the LMCC on this matter and we look forward to the revision and implementation of the concepts detailed in NPRM 92-235 which will be of mutual benefit to all land mobile radio users.

Respectfully Submitted,

**POLICE DEPARTMENT
COUNTY OF NASSAU
NEW YORK**

By:

A handwritten signature in dark ink, appearing to read 'William McHale', written over a horizontal line.

William McHale

**Captain
Commanding Officer
Communications Bureau**

JULY 29, 1993